

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:	§	
Mehmet Sayal	§	Confirmation No.: 8853
	§	
Serial No.: 09/943,223	§	Group Art Unit: 2191
	§	
Filed: August 29, 2001	§	Examiner: Deng, Anna Chen
	§	
For: METHOD AND SYSTEM FOR	§	Atty. Docket: 10010316-1
INTEGRATING WORKFLOW	§	NUHP:0387/FLE/ POW
MANAGEMENT SYSTEMS WITH	§	
BUSINESS-TO-BUSINESS	§	
INTERACTION STANDARDS	§	

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July 8, 2008	/W. Allen Powell/
Date	W. Allen Powell

**REPLY BRIEF PURSUANT TO 37 C.F.R. § 41.41 AND IN
RESPONSE TO THE EXAMINER'S ANSWER MAILED MAY 12, 2008**

This Reply Brief is being filed pursuant to 37 C.F.R. § 41.41 and in response to the Examiner's Answer mailed on May 12, 2008. Specifically, this Reply Brief addresses the Examiner's continuing pattern of misinterpretation of ICL Enterprises, *A Common Object Model Discussion Paper*, Document Number WfMC-TC-1022, 1998 (hereinafter "ACOMDP"), Anderson et al., *Workflow Interoperability – Enabling E-Commerce*, April 1, 1999, www.wfmc.org (hereinafter "Anderson"), and the pending claims. In the interest of brevity, Appellants have attempted to prepare this Reply Brief such that it does not unnecessarily repeat the arguments previously presented in the Appeal Brief.

Accordingly, Appellants respectfully request that the Board consider Appellants' complete arguments set forth in the previously filed Appeal Brief.

In the Examiner's Answer, the Examiner asserted that "ACOMDP does teach receiving a description of a business-to-business interaction standard" and cited page 4, section 2 of ACOMDP as support for this assertion. Examiner's Answer, page 12. Previously, the Examiner asserted that this claim feature was disclosed in item 3.2 on page 9 of ACOMDP. *See* Office Action mailed November 16, 2007, page 2. However, the Appellants assert that these cited portions of ACOMDP fail to even mention *receiving a business-to-business interaction standard*. In the Examiner's Answer, the Examiner appears to suggest that ACOMDP discloses *receiving a description of a business-to-business interaction standard* because it mentions "enactment of a single business process across several different work systems in different departments or organizations." Examiner's Answer, page 12. However, Appellants assert that this merely appears to refer to performing a single business process with multiple work systems that happen to be located in different departments or organizations.

Accordingly, as further supported by the Appeal Brief filed on August 2, 2007, ACOMDP does not teach the *business-to-business interaction standard*, as recited in claim 1, much less receiving a description of such a standard. Likewise, Appellants assert that ACOMDP fails to disclose "receiving a high-level process definition," as recited in claim 11, or "a structured process definition generator for receiving a description of a business-to-business interaction standard," as recited in claim 17. Additionally, Appellants assert that Anderson does not remedy the deficiencies of ACOMDP. Indeed, Appellants have asserted throughout the prosecution history that Anderson is deficient in this regard and merely discloses participating in E-Commerce.

In the Examiner's Answer, the Examiner asserted that "ACOMDP does disclose *converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard*." Examiner's Answer,

page 13 (emphasis in original). As support for this assertion, the Examiner cited pages 7 and 9 of ACOMDP, and page 5, paragraph 5 of Anderson. However, Appellants assert that after closely reviewing these cited portions of the references, Appellants can find no support for “*converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard,*” as recited in claim 1. (Emphasis added). Rather, Anderson merely appears to disclose a contract that describes workflow definitions. This is not *converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard*. Additionally, based on the Examiner’s characterization of the cited portion of ACOMDP, Appellants assert that ACOMDP merely discloses that a particular interoperability standard is agreed to as an industry standard. Even if an interoperability standard could be considered a business-to-business interaction standard, this is not equivalent to *converting the description of business-to-business interaction standard to a structured representation*. Further, such an interpretation would actually teach away from the recitation of “*receiving a business-to-business interaction standard,*” because there would be no need to transfer a standard if all of the businesses agreed to implement a single standard.

Accordingly, whether consider separately or in a hypothetical combination, the cited references fail to disclose “converting the description of business-to-business interaction standard to a structured representation of the business-to-business interaction standard,” as recited in claim 1. Likewise, the cited references fail to disclose “*converting the high-level process definition into a structured data and flow,*” or “a structured process definition generator ... *for generating a structured business-to-business process definition,*” as recited in claims 11 and 17, respectively. With regard to the Examiner’s arguments addressing claims 11 and 17, Appellants note that section 5.2 and the figure on page 13 of ACOMDP are directed to a meta-model, which merely appears to *identify* core process definition entities, relationships and attributes, and a neutral interchange representation of the process definition. ACOMDP, page 13. The

disclosure related to the meta-model does not appear to correspond to the recited features of claims 11 and 17 set forth above.

In the Examiner's Answer, the Examiner asserted that ACOMDP and Anderson disclose "automatically generating at least one process template based on the structured representation of the business-to-business interaction standard," as recited in claim 1. While the Examiner previously appeared to concede that ACOMDP fails to disclose this feature, in the Examiner's Answer, the Examiner's position appears to be that the "WorkActivities" described in ACOMDP are equivalent to the recited templates. As described by ACOMDP, a WorkActivity appears to represent a process step. ACOMDP, page 7. Further, ACOMDP indicates that a set of WorkActivities represents the process steps of a "process model." *Id.* A "process model" is not believed to be equivalent to a business-to-business interaction standard. Rather, the term "process model" merely appears to reference a model of business activities that could be obtained from a process modeling tool. *See* ACOMDP, page 3, section 1.1. Thus, Appellants assert that ACOMDP does not disclose "*automatically generating at least one process template based on the structured representation of the business-to-business interaction standard,*" as recited in claim 1. (Emphasis added).

Additionally, the Examiner appeared to assert that the disclosure of a process definition in Anderson is equivalent to a process template based on the structured representation of the business-to-business interaction standard. Specifically, the Examiner stated, "Anderson, p. 3, paragraph 3, the workflow engine reads the appropriate process definition and starts the first defined *activity* which, in the case of the retailer, may be to display an order form for completion." Examiner's Answer, page 15 (emphasis in original). Appellants assert that one of ordinary skill in the art would not equate a process definition with a process template. Further, an activity defined by a process definition is clearly not a template, as presently recited. Further, in consideration of the entire reference, Appellants stress that Anderson appears to indicate that authors develop each WfMC Standard to address difficulties in interoperability between specific

work flow engines because of different conceptual models, behavioral characteristics, and capabilities. Accordingly, Appellants assert that Anderson actually teaches away from *automatically generating a process template based on the structured representation of a business-to-business interaction standard*, as recited in claim 1. Likewise, Appellants assert that the cited references fail to disclose “generating a business-to-business (B2B) *service template* for the extracted interaction point,” or “a process template generator for automatically generating a business-to-business *process template* based on a structured business-to-business process definition,” as recited in claims 11 and 17, respectively.

In the Examiner’s Answer, the Examiner asserted that ACOMDP and Anderson disclose “using the process template to design a work flow.” As support for this assertion, the Examiner pointed to paragraph 3 on page 3 of Anderson. With regard to this, the Examiner stated “as an activity is a template, a process instance of a defined thread of activity that read on limitation of ‘using the process template to design a workflow.’” Examiner’s Answer, page 15. While Appellants assert that the Examiner’s statement is unclear, Appellants stress that the cited portion of Anderson more clearly indicates that an “activity” is not a process template. Indeed, if an activity is equivalent to a process template, Anderson could essentially be interpreted as stating that a process instance is a *defined thread of process template*, which Appellants assert makes no sense. To further emphasize this deficiency, the portion of Anderson cited by the Examiner as teaching this feature of claim 1 is reproduced below:

Each new process that is started on a workflow engine is known as a *process instance*. A *process instance* is a defined thread of activity that is being *enacted* (managed) by a workflow engine. Most workflow engines can report on the current status of a given process instance.

Anderson, page 3, third paragraph (emphasis in original).

In the Examiner’s Answer, the Examiner asserted that ACOMDP and Anderson disclose “a process template repository for storing the business-to-business process

templates,” as recited in claim 17. Additionally, the Examiner asserted that ACOMDP and Anderson disclose “storing template into a process template repository ... and storing the service templates into a service template repository,” as recited in claim 8, and “a service template repository for storing business-to-business service templates,” as recited in claim 18. While the Examiner indicated a hypothetical combination of ACOMDP and Anderson, the Examiner did not make any specific arguments with regard to Anderson. With regard to ACOMDP, Appellants assert that ACOMDP merely teaches a repository for storing “process definition data.” Further, the Examiner’s arguments with respect to the meta-model described on page 13 of ACOMDP are confusing. Indeed, the statement the Examiner appears to be relying on is apparently about holding data in a certain format, not storing process templates. Accordingly, Appellants assert that the cited references do not appear to contain any discernable reference to a process template repository for storing the business-to-business process templates, as recited in claim 17. Further, Appellants assert that the cited references certainly fail to disclose a “service template repository,” as recited in claims 8 and 18.

With regard to the Examiner’s rejection of dependent claims 3 and 14, Appellants reiterate that the Examiner appears to have taken the cited portion of Anderson out of context. Indeed, the illustrated “order fulfillment scenario” and “order fulfillment process flow diagram” of Anderson do not appear to relate to the recitations of claims 3 and 14 corresponding to defining transitions for each state and defining states for each transition.

Regarding the Examiner’s rejection of dependent claim 7, Appellants reiterate that that the cited references fail to disclose automatically generating a process template based on the structured representation of the business-to-business interaction standard. Accordingly, the cited references certainly fail to disclose “automatically converting the structured data and flow into at least one process template that is specific to a particular workflow management system,” as recited in claim 7. Indeed, as discussed above, the

ACOMDP reference apparently indicates that a single standard is agreed upon, and, thus, there would be no need for any type of conversion.

With regard to dependent claim 12, Appellants assert that the cited references fail to disclose “automatically extracting a plurality of business-to-business (B2B) interaction points; and generating a business-to-business (B2B) service template for each extracted interaction point.” First, with regard to extracting business-to-business interaction points, the Examiner merely cited a portion of Anderson that appears to have nothing to do with business-to-business interaction points, much less automatic extraction of such points. Rather, the cited portions of Anderson merely appears to relate to a contract between companies and reading a process definition.

For each of the reasons set forth above, Appellants respectfully request that the Board overturn the Examiner’s rejection of independent claims 1, 11, and 17, as well as the claims that depend therefrom.

Conclusion

Appellants rely upon all of the reasons advanced in the Appeal Brief, and respectfully request that the Board carefully review the claims in view of these arguments and indicate the allowability of the claimed subject matter.

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